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June 10, 1987

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William J. Tricarico
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

**In Re: The Impact of Advanced Television
Technologies on Local Television
Broadcasting, RM-5811**

Dear Mr. Tricarico:

Pursuant to the Commission's Public Notice of March 27, 1987 (Report No. 1650), Home Box Office, Inc. ("HBO") hereby submits these comments in support of the Petition for Notice of Inquiry ("Petition") in the above-referenced matter, filed by the Association of Maximum Service Telecasters and other broadcast entities on February 13, 1987. The Petition (at p. 1) requests the Commission to institute an inquiry "into the issues arising from the introduction of HDTV [High Definition Television] and other technologies and the possible impact of such new technologies on the universal availability of local broadcast service and on the viability of the local broadcast system."

HBO agrees that the development of HDTV warrants the issuance of a Notice of Inquiry ("NOI"). An NOI will serve to focus attention on HDTV in a single proceeding and thereby help define the issues more clearly.

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While areas of inquiry outlined in the Petition are necessary, HBO submits that the NOI also should seek responses to other questions that should be answered. In HBO's view, among these additional questions are:

- 1) How can we improve on today's television technology?
- 2) How can the television industry achieve a wider aspect ratio?
- 3) How do we make the highest possible audio quality, with multiple channel potential, available to the consumer?
- 4) What can we do to see that this technology is made available to consumers at reasonable prices?
- 5) How can consumer equipment be designed so as to be backward compatible?
- 6) How do we select the optimum HDTV frequency plan and exploit the current spectrum allocation to the maximum extent?
- 7) How do we insure that HDTV will be compatible with cable television systems?

HBO urges the Commission to include these seven questions in its NOI. Moreover, consistent with its recent approaches to the introduction of new technologies, HBO submits that the Commission should proceed with the NOI based on the underlying premise that the marketplace should dictate the evolution of any technical standards that may be necessary to implement an improved television system. With these concepts firmly in place, the NOI will

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serve a useful purpose of focusing attention on the relevant issues surrounding the introduction of new television technologies.

Respectfully submitted,



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